

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division

METROPOLITAN SOLUTIONS GROUP, INC.,

Plaintiff,

v.

Case No. 4:21-cv-00099-RCY-DEM

VIVIAN DAMARIS RODRIGUEZ, *ET AL.*,

Defendants.

**PLAINTIFF METROPOLITAN SOLUTIONS GROUP, INC.'s MOTION TO STRIKE
DEFENDANT VIVIAN RODRIGUEZ'S ANSWER AND AFFIRMATIVE DEFENSES
AND LETTER IN OPPOSITION TO DEFAULT, OPPOSITION TO DEFAULT
JUDGMENT**

COMES NOW, the Plaintiff Metropolitan Solutions Group, Inc., by undersigned counsel, who respectfully moves to strike the Answer and Affirmative Defenses offered by the Defendant [ECF 55], Vivian Damaris Rodriguez, and to strike the Letter In Opposition to Default, Opposition To Default Judgment [sic] offered by the Defendant, Vivian Damaris Rodriguez [ECF 56], upon such bases as are more particularly set forth in Plaintiff's Memorandum of Law in Support of It's Motion to Strike, which accompanies this Motion.

WHEREFORE, on the bases of this Motion together with the Memorandum of Law which accompanies it, the Plaintiff Metropolitan Solutions Group, Inc., hereby respectfully moves that the Court strike the Answer and Affirmative Defenses offered by Defendant Rodriguez [ECF 55], and to strike the Letter In Opposition To Default, Opposition To Default Judgment [ECF 56], offered by Defendant Rodriguez, together with such other relief as the Court may deem appropriate in this cause.

March 9, 2022.

METROPOLITAN SOLUTIONS GROUP, INC.

By: _____ / S /
Of Counsel

Stephen E. Heretick, Esq.
Virginia Bar No. 29919
STEPHEN E. HERETICK, P.C.,
715 Loudoun Avenue
Portsmouth, Virginia 23707
(757) 397-9923
(757) 397-9925 (fax)
Steve@Hereticklaw.com

Counsel for the Plaintiff, Metropolitan Solutions Group, Inc.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing, Plaintiff Metropolitan Solutions Group, Inc.'s Motion To Strike the Answer and Affirmative Defenses and Letter in Opposition to Default and Opposition to Default Judgment offered by the Defendant Vivian Rodriguez was served this Ninth (9th) day of March, 2022, to all counsel of record by and through the Electronic Case Filing (ECF) system of the United States District Court for the Eastern District of Virginia, and to all parties proceeding *pro se* by the United States Mail, postage prepaid.

By: _____ / S /
Of Counsel